

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

Consolidated Cases Nos. 12-382 c/w 14-003

c/w 15-710 c/w 15-711-LKG

Biloxi Marsh Lands Corporation, *et al.*,

Plaintiffs,

Versus

The United States of America,

Defendant.

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Hon. Ryan T. Holte

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
PROVIDE FINAL SUPPLEMENTAL RESPONSES TO THE GOVERNMENT'S
INTERROGATORIES**

NOW COME all the Plaintiffs in all the consolidated cases (12-382 c/w 14-003 c/w 15-710 c/w 15-711) and respectfully move the Court for a short extension of the October 7, 2022 date (subsequently extended by agreement of counsel until October 17, 2022) by which they were required to provide final supplemental responses to the government's interrogatories served September 2015 and June 2021, for the following reasons:

1.

In the Joint Status Report filed June 29, 2022 [ECF No. 203], Plaintiffs' counsel noted the potential need for additional time to complete the review of the over thirty-eight thousand (38,000) documents produced by the United States during the past months, which Plaintiffs' counsel needed to accomplish in order to respond to the government's discovery.

2.

Counsel for the United States has graciously cooperated with Plaintiffs' counsel by

twice agreeing to extend the August 1, 2022 original date by which Plaintiffs were required to provide final supplemental responses to the government's interrogatories served September 2015 and June 2021.

3.

Due to the large number of documents that Plaintiffs' counsel has had to review and because of a medical problem that will require Plaintiffs' counsel to undergo a medical surgical operation on November 14, 2022, Plaintiffs' counsel needs and hereby requests a short extension until November 4, 2022 to complete his review of the documents and then prepare Plaintiffs' final supplemental responses to the interrogatories the government served September 2015 and June 2021.

4.

This request for extension is not intended to delay the prosecution of this case in any manner. Counsel for the United States, Mr. Josh Wilson, has indicated he does not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that the Court extend until and including November 4, 2022 the date by which they are required to provide final supplemental responses to the government's interrogatories served September 2015 and the interrogatories and documents requests the government served on June 2021.

Respectfully submitted by ECF filing this 27th day of October, 2022.

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